

VIA ELECTRONIC SUBMITTAL

December 3, 2018

David Greinke
Office of Water Quality
Indiana Department of Environmental Management (IDEM)
100 North Senate Avenue – Post Office Box 6015
Indianapolis, IN 46206

Subject:

United States Steel Corporation Gary Works - Midwest Plant

NPDES Permit IN0000337 Foaming at Outfall 004

Dear Mr. Greinke:

This letter is the written five-day submission regarding foaming at Outfall 004 at the U. S. Steel Corporation – Midwest Plant ("Midwest") which occurred on November 28, 2018. Outfall 004 is a permitted outfall to the Portage-Burns Waterway under NPDES Permit IN0000337 effective April 1, 2016. Outfall 004 sources includes the Final Treatment Plant (internal Outfall 104) and the Chrome Treatment Plant (internal Outfall 204). As described below, the foam was found to be due to insufficient defoamer addition, and was not attributed to any pollutant regulated under the NPDES permit, including chromium.

On November 28, 2018 IDEM visited the Midwest facility outfalls in response to a public report of a "white discharge" to Burns Waterway from the facility, which was submitted to IDEM on that same day. David Greinke, IDEM Emergency Response, contacted Midwest regarding the report at approximately 1:37 p.m. and arrived at the facility at approximately 1:45 p.m. Mr. Greinke and a Midwest Environmental Manager observed Outfall 004 and saw evidence of foam extending approximately 40 yards into the Burns Waterway before dissipating. Midwest Environmental attempted to collect a grab sample of the foam, but by the time personnel were able to access the waterway for sampling, the foam was no longer present in the receiving stream. A grab sample was collected at Outfall 004 and analyzed for surfactants by a third-party laboratory. The result of the analysis is attached.

The effluent discharge channel of the Final Treatment Plant (internal Outfall 104) was observed with no visible indication of foaming. A 24-hour composite sample and a grab sample were collected and expedited for analysis by Midwest's contracted third-party laboratory. Both results were found to be non-detect for hexavalent chromium and well below permit limits for all other constituents.

U. S. Steel made notification to the National Response Center as is required in the current draft of the Operations and Maintenance Plan Appendix B This notification was made at approximately 4:15pm, and complied with both permit requirements and the current Operations and Maintenance Manual Notification List. IDEM was already made aware through the phone call and site visit.

On November 29, 2018 David Greinke, Nick Ream (IDEM NPDES inspector), and Rick Massoels (IDEM Deputy Director) visited Midwest again as a follow up. There was no foaming observed at Outfall 004. U. S. Steel made several observations of Outfall 004 throughout the day on November 29th, and on subsequent days as well, and has not observed any more foaming.

Upon completion of the initial observation and sampling efforts on November 28th, U. S. Steel began an investigation into the cause of the Outfall 004 foam, and continues to evaluate the potential interactions between the Outfall 004 and Burns Waterway. The Chrome Treatment Plant was found to be operating normally. Internal process monitoring indicated no issues or elevated chromium levels. The Final Treatment Plant was operating normally.

If you have any questions about this matter, please call me at (313) 749-3900 or email me at APiscitelli@uss.com.

Sincerely,

Alexis Piscitelli

Director – Environmental Compliance

United States Steel Corporation

Great Lakes Works, Midwest Plant

cc: Nicholas Ream, IDEM

Tim Sullivan, U. S. Steel

Eric Williams, U. S. Steel

Nicole Benoit, P.E., U. S. Steel